97-A58 ERPP

United States Department of Agriculture
Forest Service
Pacific Southwest Region
Regional Office, R5
630 Sansome Street
San Francisco, CA 94111-2214
415-705-1098 Text (TTY)
415-705-2896 Voice

OCT 20 1997

File Code: 1500

Date: OCT 14 1997

Mr. Lester Snow
CALFED Bay-Delta Program
1416 Ninth Street, Suite 1155
Sacramento, California 95814

RE: Ecosystem Restoration Program Plan Comments

Dear Mr. Snow:

First, let me compliment you and the CALFED staff. The complexity of a comprehensive plan to restore the ecological health and water management of the Bay-Delta cannot be overstated. The Ecosystem Restoration Program Plan (ERPP) is one example of the quality and quantity of work and interrelated activities necessary to achieve the CALFED Program objectives. The following observations are offered to strengthen the quality of the document and subsequent success of the CALFED Program.

Volume I begins by building the vision and role the upper watersheds contribute to improvements in the Bay-Delta. Specifically, the upper watershed stressors (fire and erosion) contribute to water quality, fish habitat quality and overall health of the ecosystem. By the time Volume III is reached the role of the upper watersheds seems to be relegated to a non-essential position. An example of this is the passive description on page four for the upper watersheds as "supportive" rather than the active descriptors on pages three and four used to describe restoration activities in Ecological Zones. I strongly urge you to connect the three volumes for the upper watersheds with actions and targets consistent with the visions described in Volume I.

In volume II, the Ecological Zones and Units continue to incorporate the theme and visions for the upper watersheds described in volume I. An example is the North Sacramento Valley Upper Watershed Vision for Ecological Processes (page 161) appropriately describes the Processes as "using state-of-the-art timber harvest, road construction, and grazing practices to protect water supplies, water quality, and habitats that contribute to the overall health of the Bay-Delta and the ecological zones that lie in between." The targets and actions (page 167) are appropriate at the programmatic level. The "Visions for Ecological Processes" and the "Implementation Objectives, Targets, and

Programmatic Actions" are thematically the same for all the upper watersheds included in seven of the fourteen Ecological Zones. Again, as in Volume I - Visions for Ecosystem Elements, the Ecological Zone Visions described in Volume II are not carried forward into Adaptive Management concepts in Volume III.

Volume III, page 19 states, "additional implementation strategies need to be developed for the following types of large-scale programs" one of which is upper watershed planning and restoration. Included with this point is the statement that "this fall (sic) under the purview of the Water Quality Program but has a strong link to the ERPP." I agree that the upper watersheds are also a component of the Water Quality Program and believe they have a role in Ecosystem Restoration as previously noted. However, at this point, I want to focus on the reference to the Water Quality Program.

Information presented in the ERPP indicates the Water Quality Program focus is on salinity, bromides and total organic carbon (TOC) contaminates further described as inorganic, organic and biological contamination from municipal wastewater, urban and agricultural runoff. Water quality, one of the 18 distinguishing characteristics, is disaggregated into In-Delta Water Quality and Export Water Quality. Neither mention the upper watersheds. In fact, the document Examples of the Level of Detail of Information Sets Available for Selection of Preferred Alternatives, provided to the Policy Group at their August 14 and 15 meeting, set the tone for the Water Quality Program. Attachment B-2, of this document, Example Environmental Impacts of Water Quality Common Program, described the tone (targets) as "programmatic actions to reduce water quality degradation from agricultural drainage, urban and industrial runoff, mine drainage and municipal and industrial wastewater discharges. Most actions involve a reduction in discharge of constituents of concern to waterways; others involve changes in timing of wastewater release and relocation of water supply intakes." The information does not lead me to believe the upper watersheds are being included in CALFED's work on Water Quality.

Some specific comments are provided in the enclosed. I appreciate the opportunity to review the three volumes, appreciate the hard work that has gone into their development, and hope our comments are helpful in strengthening the text.

Sincerely,

for G. LYNN SPRAGUE
Regional Forester

Enclosure

G-006085